

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA

: CRIMINAL NO. _____

v.

: DATE FILED: _____

**JOSEPH TERRELL,
a/k/a “James Terrell,”
a/k/a “Jerry Jordan,”
a/k/a “James Jordan,”
a/k/a “Jay,” and
ABDUL HAMEED I. MUHAMMAD,
a/k/a “Fig”**

**: VIOLATIONS: 21 U.S.C. § 841(a)(1)
(Distribution of
cocaine base (“crack”) - 2
counts)
:
:
21 U.S.C. § 841(a)(1)
(Possession with intent to
distribute cocaine - 2
counts)
18 U.S.C. § 924(c)
(Possession of a firearm
in relation to a drug
trafficking crime - 3 counts)
18 U.S.C. § 922(o)
(Possession of a machine
gun - 1 count)
21 U.S.C. § 853
18 U.S.C. § 924(d) and 28
U.S.C. § 2461(c)
(Notice of criminal
forfeiture)
18 U.S.C. § 2
(Aiding & abetting)**

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

On or about September 23, 2003, at Allentown, Pennsylvania, in the Eastern

District of Pennsylvania, defendant

**JOSEPH TERRELL,
a/k/a “James Terrell,”
a/k/a “Jerry Jordan,”**

**a/k/a “James Jordan,”
a/k/a “Jay,”**

knowingly and intentionally distributed in excess of 50 grams, that is, approximately 240.4 grams, of a mixture or substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 23, 2003, at Allentown, Pennsylvania, in the Eastern District of Pennsylvania, defendants

**JOSEPH TERRELL,
a/k/a “James Terrell,”
a/k/a “Jerry Jordan,”
a/k/a “James Jordan,”
a/k/a “Jay,” and
ABDUL HAMEED I. MUHAMMAD,
a/k/a “Fig,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, in excess of 50 grams, that is, approximately 97.7 grams, of a mixture or substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A), and Title 18, United States Code, Section 2.

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 12, 2003, at Allentown, Pennsylvania, in the Eastern District of Pennsylvania, defendant

**JOSEPH TERRELL,
a/k/a “James Terrell,”
a/k/a “Jerry Jordan,”
a/k/a “James Jordan,”
a/k/a “Jay,”**

knowingly and intentionally possessed with intent to distribute in excess of 500 grams, that is, approximately 1,000 grams (1 kilogram), of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 12, 2003, at Allentown, Pennsylvania, in the Eastern District of Pennsylvania, defendant

**JOSEPH TERRELL,
a/k/a “James Terrell,”
a/k/a “Jerry Jordan,”
a/k/a “James Jordan,”
a/k/a “Jay,”**

knowingly possessed a firearm, that is, an ARMI 9mm semi-automatic pistol, serial no. G20385, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, possession with intent to distribute cocaine, in violation of Title 21, United States Code, Section 841(a)(1), as charged in this indictment.

In violation of Title 18, United States Code, Section 924(c)(1)(A).

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 12, 2003, at Allentown, Pennsylvania, in the Eastern District of Pennsylvania, defendant

**JOSEPH TERRELL,
a/k/a “James Terrell,”
a/k/a “Jerry Jordan,”
a/k/a “James Jordan,”
a/k/a “Jay,”**

knowingly possessed a firearm, that is, a machine gun, that is, a Cobray M-12 type machine pistol, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, possession with intent to distribute cocaine, in violation of Title 21, United States Code, Section 841(a)(1), as charged in this indictment.

In violation of Title 18, United States Code, Sections 924(c)(1)(A) and 924(c)(1)(B)(ii).

COUNT SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 12, 2003, at Allentown, Pennsylvania, in the Eastern
District of Pennsylvania, defendant

**JOSEPH TERRELL,
a/k/a “James Terrell,”
a/k/a “Jerry Jordan,”
a/k/a “James Jordan,”
a/k/a “Jay,”**

knowingly possessed a machine gun, that is a Cobray M-12 type machine gun.

In violation of Title 18, United States Code, Section 924(o)(1).

COUNT SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 12, 2003, at Allentown, Pennsylvania, in the Eastern District of Pennsylvania, defendant

**ABDUL HAMEED I. MUHAMMAD,
a/k/a “Fig,”**

knowingly and intentionally possessed with intent to distribute a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 12, 2003, at Allentown, Pennsylvania, in the Eastern District of Pennsylvania, defendant

**ABDUL HAMEED I. MUHAMMAD,
a/k/a "Fig,"**

knowingly possessed a firearm, that is, a Taurus .357 cal. revolver, serial no. VC936460, in furtherance of a drug trafficking crime for which he may be prosecuted in a Court of the United States, that is, possession with intent to distribute cocaine, in violation of Title 21, United States Code, Section 841(a)(1), as charged in this indictment.

In violation of Title 18, United States Code, Section 924(c)(1)(A).

NOTICE OF CRIMINAL FORFEITURE

1. As a result of the violations of Title 21, United States Code, Section 841(a)(1), as charged in this indictment, defendants

**JOSEPH TERRELL,
a/k/a “James Terrell,”
a/k/a “Jerry Jordan,”
a/k/a “James Jordan,”
a/k/a “Jay,” and
ABDUL HAMEED I. MUHAMMAD,
a/k/a “Fig,”**

shall forfeit to the United States of America pursuant to Title 21, United States Code, Section 853, the following property:

(A) Any property used or intended to be used, in any manner or part, to commit or facilitate the commission of, the violations of Title 21, United States Code, as charged in this indictment; and

(B) any property, including but not limited to the sum of \$2,800, which constitutes and is derived from proceeds obtained directly or indirectly as the result of the violations of Title 21, United States Code, as charged in this indictment.

2. If any of the property described above as being subject to forfeiture, as a result of any act or omission of defendants:

- (A) cannot be located upon the exercise of due diligence;
- (B) has been transferred or sold to, or deposited with, a third party;
- (C) has been placed beyond the jurisdiction of the court;
- (D) has been substantially diminished in value; or
- (E) has been commingled with other property which cannot be divided

without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) to seek forfeiture of any other property of said defendants.

All pursuant to Title 21, United States Code, Section 853.

3. As a result of the violations of Title 18, United States Code, Sections 924(c)(1) set forth in this indictment, defendants

**JOSEPH TERRELL,
a/k/a “James Terrell,”
a/k/a “Jerry Jordan,”
a/k/a “James Jordan,”
a/k/a “Jay,” and
ABDUL HAMEED I. MUHAMMAD,
a/k/a “Fig,”**

shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c), all firearms and ammunition involved in the commission of these offenses, including, but not limited to:

- (1) an ARMI 9 mm semi-automatic pistol, serial number G20385, and 25 live rounds of Winchester brand hollow point ammunition and a loaded 30 round magazine;
- (2) a COBRAY MAC 10 machine pistol, no serial number, and two magazines of ammunition;
- (3) a .22 cal. North American Arms long gun Derringer pistol, serial no. L051406, and 5 LVE brand hollow point .22 cal bullets, one box of American Eagle brand .22 cal bullets, and one box of Surok brand .22 cal bullets;

(4) six unpackaged .45 cal Federal brand bullets;

(5) one Taurus .357 cal. revolver, serial no. VC936460, 7 .357 cal bullets, 5 small caliber bullets and 33 Ruger 9 mm bullets.

All pursuant to Title 28, United States Code, Section 2461(c) and Title 18, United States Code, Section 924(d).

A TRUE BILL:

FOREPERSON

PATRICK L. MEEHAN
United States Attorney